

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ZAIDA HICKS and STEPHANIE VARGAS individually and on behalf of all others similarly situated, Plaintiffs, v. L'OREAL USA, INC., Defendant.	Civil Action No.: 22-cv-1989-JPC COMPLAINT FOR DAMAGES DEMAND FOR JURY TRIAL
SONIA CAUCHI and STEPHANIE BRANTON individually and on behalf of all others similarly situated, Plaintiffs, v. L'OREAL USA, INC., Defendant.	Civil Action No.: 22-cv-3926-JPC COMPLAINT FOR DAMAGES DEMAND FOR JURY TRIAL

**STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES AND
EXTENDING TIME TO FILE A CONSOLIDATED AMENDED COMPLAINT**

WHEREAS, the matter of *Hicks v. L'Oreal USA, Inc.*, No. 22-cv-1989-JPC was filed on March 9, 2022;

WHEREAS, the related matter of *Cauchi v. L'Oreal USA, Inc.*, No. 22-cv-3926-JPC was filed on May 13, 2022;

WHEREAS, both matters contain substantially similar allegations and plead substantially similar causes of action;

WHEREAS, the matters share a common question of fact or law, as required by Fed. R. Civ. P. 42;

WHEREAS, Defendant L'Oreal USA, Inc. filed a motion to dismiss in the *Hicks* matter on June 24, 2022;

WHEREAS, Plaintiffs Zaida Hicks and Stephanie Vargas must file an opposition to the motion to dismiss on or before July 22, 2022;

WHEREAS, Defendant L'Oreal USA, Inc. has not yet moved to dismiss in the *Cauchi* matter but intends to do so;

WHEREAS, the plaintiffs in either matter have not yet amended their complaints as a matter of course;

NOW THEREFORE, it is hereby STIPULATED and AGREED that the above-captioned matter should be consolidated pursuant to Fed. R. Civ. P. 42(a), and that, if so, Plaintiffs shall file a consolidated amended complaint as a matter of course on or before August 23, 2022, and that Defendant shall respond by answer or pre-motion letter by September 13, 2022.

Dated: July 19, 2022

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THE COURT, having considered the STIPULATION of the parties, orders that the above-captioned matters be consolidated pursuant to Fed. R. Civ. P. 42(a); that Plaintiffs shall file a consolidated amended complaint as a matter of course on or before August 23, 2022; and that Defendant shall respond by answer or pre-motion letter by September 13, 2022.

IT IS SO ORDERED.

Hon. John P. Cronan